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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

LA ALLIANCE FOR HUMAN RIGHTS, et al.,

Case No.: 2:20-cv-02291-DOC-KES
Assigned to Judge David O. Carter

Plaintiffs,

vs.

CITY OF LOS ANGELES, a municipal entity;
COUNTY OF LOS ANGELES, a municipal
entity; and DOES 1 through 10 inclusive,

STATUS REPORT

Date: April 1, 2020

Time: 4:00 p.m.

Defendants.

On April 1, 2020, the Court issued a minute order explaining that the Court received information causing concern over the lack of sufficient sanitary facilities to meet the basic needs of the community of persons experiencing homelessness in the area generally referred to as Skid Row in the City of Los Angeles. The Court ordered the City of Los Angeles and the County of Los Angeles (“County”) to file a status report update by April 1, 2019 at 4:00 p.m. concerning the timing for installation of toilets and sanitation stations in Skid Row. Pursuant to the Court’s direction, the County respectfully submits this separate Status Report.

1 **I. COUNTY ACTIONS**

2 **1. Public Education**

3 The County is sensitive to the need to encourage hygiene given the COVID-19
 4 crisis. The County has worked diligently to educate the public concerning the appropriate
 5 practices and protocols necessary to mitigate the risk of COVID-19. Those
 6 communications are intended for the public, including those individuals experiencing
 7 homelessness. The County has every intention to continue with these efforts.

8 **2. Hygiene Facilities**

9 In terms of hygiene facilities, hygiene is a municipal responsibility. Each city within
 10 the County is responsible for maintaining hygiene within its jurisdictional boundaries. The
 11 County is responsible for hygiene in unincorporated areas. As of today, the County already
 12 has deployed 100 hand washing stations in certain areas outside the City of Los Angeles
 13 (with input from LAHSA to determine areas of need).¹ Since the City of Los Angeles has
 14 jurisdictional control and responsibility for Skid Row, the City has taken the lead in
 15 procuring hygiene facilities within Skid Row while the County has worked to balance
 16 hygiene needs among persons experiencing homelessness elsewhere in the County.

17 On the issue of financial support for hygiene facilities, on March 17, 2020, the
 18 Governor signed SB 89, i.e., emergency legislation that authorizes \$500 million in
 19 immediately available funding to help California fight COVID-19 for any purpose related
 20 to the State's March 4, 2020 proclamation of a State of Emergency, including to support
 21 local governments to protect the health and safety of homeless populations and to reduce
 22 the spread of COVID-19 in homeless populations. See Exhibit A (CEO Letter to Board).
 23 The County received, and as of yesterday accepted, approximately \$10.6 million, which
 24 we understand is approximately half of the amount received by the City of Los Angeles.
 25 Accordingly, the Board of Supervisors voted to approve a policy to "support cities (other
 26 than Los Angeles and Long Beach which are receiving this funding directly from the State)

28 ¹ The County increased its deployment by an additional 10 stations since the County's status report dated March 24, 2020.

1 in executing their responsibilities for sanitation during this emergency for people
2 experiencing homelessness.” *Id.* Potential uses of the funding include, but are not limited
3 to:

- 4 • Mobile toilet facilities and supplies;
- 5 • Mobile shower facilities and supplies;
- 6 • Handwashing stations; and
- 7 • Staffing, supplies, and services to clean and maintain the above types of
8 emergency hygiene facilities and equipment.

9 This is consistent with the actions that the County has adopted previously. However,
10 the County will remain engaged with the City of Los Angeles to coordinate on other areas
11 of need, as it has done in the past.

12 **3. Discussions with Special Master**

13 On April 1, 2020, the Court identified the need for the installation of 50 additional
14 toilets and 50 additional sanitation stations in Skid Row. In accordance with the Court’s
15 April 1, 2020 order, counsel for the County contacted the Special Master, the Honorable
16 Jim Smith. The County was informed that counsel for the City of Los Angeles had already
17 spoken to the Special Master and obtained the name of the private sector entity (i.e.,
18 Southwest Site Services) and the contact information for the relevant third party (i.e., Bill
19 Taromina) to discuss next steps concerning the possible procurement of toilets and
20 sanitation centers in Skid Row. The County respects the jurisdiction of the City of Los
21 Angeles and its prior work already taken to provide appropriate hygiene to persons
22 experiencing homelessness in the Skid Row area. The County also does not want to
23 unnecessarily duplicate efforts. As a result, the County will defer to the City of Los
24 Angeles’ status update on this issue at this time, until otherwise ordered by this Court.

1 Dated: April 1, 2020

MANATT, PHELPS & PHILLIPS, LLP

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3 Dated: April 1, 2020

By: /s/ Brandon D. Young

Brandon D. Young
4 Attorneys for Defendant
COUNTY OF LOS ANGELES

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6 Dated: April 1, 2020

FOLEY & LARDNER, LLP

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8 By: /s/ Byron J. McLain

9 Byron J. McLain
Attorneys for Defendant
COUNTY OF LOS ANGELES

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